UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: AUG 2 0 2007

SUBJECT: Request for Removal Action Branch Assistance at the Cornell-Dubilier Electronics Site, South Plainfield, New Jersey.

FROM: Carole Petersen, Chief
New Jersey Remediation Branch

TO: Joseph Rotola, Chief
Removal Action Branch

The purpose of this memorandum is to request assistance from the Removal Action Branch (RAB) in assessing a portion of the Cornell-Dubilier Electronics (CDE) site for removal eligibility. As you know, our branches have discussed the scope of this request over the past few weeks, and this memorandum summarizes those discussions.

In January 1997, the removal program performed a removal site evaluation for the Cornell site. This evaluation included sediment data available at that time for the Bound Brook. Specifically, there is reference to a sediment sample collected from the stream near the rear of the property, at a concentration of 550 ppm for PCBs. In addition, the following sampling events have since been performed by the removal program for the Bound Brook:

1. In August through December 1997, the EPA Removal Action Branch collected surface and subsurface soil samples from the banks and sediment samples from the streambed along the Bound Brook. Approximately 2.4 miles of the Bound Brook was investigated. The results of this investigation are summarized in the "Soil and Sediment Sampling and Analysis Report", dated 09/07/98.

2. In June 1999, soil sampling activities were performed by the EPA Removal Action Branch to characterize PCB contamination in the flood plain of the Bound Brook in Reaches 5 and 6 (as defined in the "Soil and Sediment Sampling and Analysis Report, dated 09/07/98). Reaches 5 and 6 had the highest

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mean surface soil PCB concentrations of the areas investigated. The four areas chosen for this investigation were selected based on their proximity to high use areas. Refer to the "Flood plain Soil/Sediment Sampling and Analysis Summary Report", dated 01/17/00 for the results of this investigation.

3. In April 1998, REAC performed an ecological evaluation for the Bound Brook. The objectives were to 1) to investigate the nature and extent of contamination within the Bound Brook downstream of the Cornell-Dubilier Electronics site; 2) to conduct an ecological risk assessment of a portion of the Bound Brook and its associated flood plain downstream of the Cornell-Dubilier Electronics site, and 3) to collect and analyze fish fillets from the Bound Brook downstream of the Cornell-Dubilier Electronics site for a human health risk assessment. Refer to the "Ecological Risk Assessment", dated July 1999.

These data resulted in fishing advisories for portions of the Bound Brook, New Market Pond and Spring Lake; however, no other removal response actions were deemed to be necessary at the time for the brook.

In April 2007, while exploring the brook adjacent to the site, representatives of the Edison Wetlands Association (EWA) discovered remnants of capacitors outside the fenced area of the site. While capacitors have been discovered previously along the banks of the brook adjacent to the site, the disposal patterns of CDE are not fully known and the discovery of these additional capacitors prompted several actions. Remedial Project Manager Pete Mannino and other members of our remedial action team currently on site collected obvious debris, posted additional signs, and now do periodic inspections of this area. In addition, the offices of Senators Lautenberg and Menendez, at EWA's urging, requested that EPA reconsider the removal eligibility of the Bound Brook.

If you have any questions about this request please speak with me or Pete Mannino at (212) 637-4395.